

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

CR421-0111

UNITED STATES OF AMERICA

v.

VICTOR HUGO GALLEGOS,
ROBERT CANSECO,
ADAM MATHIAS GARCIA,
a/k/a "FLAKO,"
WILLIAM RICHARD MOORE,
a/k/a "BILLY,"
AUBREY RODRIQUEZ WILLIAMS,
a/k/a "GAB,"
RAPHAEL SAMUEL SMITH,
a/k/a "RAY RAY,"
JAPHETH CHARLES ORR,
a/k/a "FATZ,"
ERIC LAVAR BROWN,
a/k/a "BOSS,"
HAROLD JENKINS JR.,
a/k/a "POUND,"
SUZANA SALINAS-GARZA,
a/k/a "SUZY,"
CHRISTOPHER JOSEPH
SHOEMAKE,
a/k/a "SHOE,"
EBONY ANTONIA PERRY,
a/k/a "EB,"
REGINALD JAVA BROWN,
a/k/a "SPOT,"
a/k/a "RED,"
NOLAN SENTAL SMITH,
a/k/a "HOT,"
a/k/a "DREDD,"
VERNEST CLEVELAND,
a/k/a "PEANUT,"
a/k/a "VITO,"
ANTONIO TEREZ GRAHAM,
a/k/a "WEEZY,"
and
TAMIKA LASHAUN HUFF.

) INDICTMENT NO.

) 21 U.S.C. § 846

) Conspiracy to Possess With

) Intent to Distribute and to

) Distribute Controlled Substances

) 21 U.S.C. § 841(a)(1)

) Distribution of Controlled

) Substances

) 18 U.S.C. § 922(g)(1)

) Possession of a Firearm by a

) Prohibited Person

) 18 U.S.C. § 924(c)

) Possession of a Firearm in

) Furtherance of a Drug

) Trafficking Crime

) 18 U.S.C. § 2

) Aiding and Abetting

) FILED UNDER SEAL

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THE GRAND JURY CHARGES THAT:

COUNT ONE

*Conspiracy to Possess With Intent to Distribute and
to Distribute Controlled Substances (Cocaine)*

21 U.S.C. § 846

Beginning on a date at least as early as April 2019, up to and including the return date of this indictment, the precise dates being unknown, in Chatham County, within the Southern District of Georgia, and elsewhere, the defendants,

**VICTOR HUGO GALLEGOS,
ROBERT CANSECO,
ADAM MATHIAS GARCIA,
a/k/a "FLAKO,"
WILLIAM RICHARD MOORE,
a/k/a "BILLY,"
AUBREY RODRIQUEZ WILLIAMS,
a/k/a "GAB,"
RAPHAEL SAMUEL SMITH,
a/k/a "RAY RAY,"
JAPHETH CHARLES ORR,
a/k/a "FATZ,"
ERIC LAVAR BROWN,
a/k/a "BOSS,"
HAROLD JENKINS JR.,
a/k/a "POUND,"
SUZANA SALINAS-GARZA,
a/k/a "SUZY,"
CHRISTOPHER JOSEPH SHOEMAKE,
a/k/a "SHOE,"
EBONY ANTONIA PERRY,
a/k/a "EB,"
REGINALD JAVA BROWN,
a/k/a "SPOT,"
a/k/a "RED,"
NOLAN SENTAL SMITH,
a/k/a "HOT,"
a/k/a "DREDD,"
VERNEST CLEVELAND,
a/k/a "PEANUT,"
a/k/a "VITO,"**

and
ANTONIO TEREZ GRAHAM,
a/k/a “WEEZY,”

aided and abetted by each other and by others known and unknown, with some joining the conspiracy earlier and others joining later, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with others known and unknown, to possess with intent to distribute and to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to possess with intent to distribute and to distribute controlled substances in the Southern District of Georgia and elsewhere for financial gain, or profit, or status.

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy for one or more members of the conspiracy to agree:

- a. to serve in different roles in the conspiracy;
- b. to possess firearms as tools of the drug trade in order to protect themselves, the drugs, and the proceeds made from the illegal drug distribution, and to retaliate against perceived threats against the organization;
- c. to use coded language to facilitate the drug trafficking operation;
- d. to operate “trap houses” to store and distribute controlled substances, to store tools of the drug trade, and to store proceeds from drug sales;

- e. to use cell phones to coordinate drug shipments and drug distribution;
- f. to keep other conspirators informed of activities, plan future transactions, and share information about drug trafficking activity for the purpose of avoiding detection and ensuring the success of the criminal organization; and
- g. to distribute controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1) and 846; and Title 18, United States Code, Section 2.

COUNT TWO

Possession With Intent to Distribute a Controlled Substance (Cocaine)

21 U.S.C. § 841(a)(1)

On or about June 10, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**ERIC LAVAR BROWN,
a/k/a “BOSS,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about June 10, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**ERIC LAVAR BROWN,
a/k/a “BOSS,”**

did knowingly possess a firearm, to wit, an American Tactical Omni 5.56 rifle, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 2 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT FOUR

Possession With Intent to Distribute a Controlled Substance (Cocaine and Marijuana)

21 U.S.C. § 841(a)(1)

On or about June 10, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**RAPHAEL SAMUEL SMITH,
a/k/a “RAY RAY,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about June 10, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**RAPHAEL SAMUEL SMITH,
a/k/a “RAY RAY,”**

did knowingly possess a firearm, to wit, a Smith and Wesson M&P .40 caliber pistol, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 4 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT SIX

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about June 10, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**RAPHAEL SAMUEL SMITH,
a/k/a “RAY RAY,”**

did knowingly possess a firearm, to wit, an Intratec 9mm Luger (Tech-9) pistol, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 4 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT SEVEN

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about June 10, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**RAPHAEL SAMUEL SMITH,
a/k/a “RAY RAY,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Smith and Wesson M&P .40 caliber pistol, which had previously been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHT

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about June 10, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**RAPHAEL SAMUEL SMITH,
a/k/a “RAY RAY,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, an Intratec 9mm Luger (Tech-9) pistol, which had previously been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE

Possession With Intent to Distribute a Controlled Substance (Cocaine)

21 U.S.C. § 841(a)(1)

On or about August 16, 2020, in Chatham County, within the Southern District of Georgia, and elsewhere within the United States, the defendants,

**ADAM MATHIAS GARCIA,
a/k/a “FLAKO,”
and
CHRISTOPHER JOSEPH SHOEMAKE,**

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about August 16, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

ADAM MATHIAS GARCIA,
a/k/a “FLAKO,”

did knowingly possess a firearm, to wit, a Sig Sauer P938, 9mm pistol, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 9 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT ELEVEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about August 16, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**ADAM MATHIAS GARCIA,
a/k/a “FLAKO,”**

did knowingly possess a firearm, to wit, a Ruger SR9C, 9mm pistol, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 9 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT TWELVE

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about August 16, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**ADAM MATHIAS GARCIA,
a/k/a “FLAKO,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Sig Sauer P938, 9mm pistol, which had previously been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTEEN

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about August 16, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**ADAM MATHIAS GARCIA,
a/k/a “FLAKO,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Ruger SR9C, 9mm pistol, which had previously been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOURTEEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about August 16, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

CHRISTOPHER JOSEPH SHOEMAKE,

did knowingly possess a firearm, to wit, a Beretta PX4 Storm, .45 caliber pistol, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 9 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT FIFTEEN

Possession With Intent to Distribute a Controlled Substance (Cocaine)

21 U.S.C. § 841(a)(1)

Beginning on or about December 16, 2020 until December 18, 2020, in the State of Texas and in Chatham County, Georgia, within the Southern District of Georgia, and elsewhere, the defendants,

**AUBREY RODRIQUEZ WILLIAMS,
a/k/a “GAB,”
EBONY ANTONIA PERRY,
a/k/a “EB,”
and
WILLIAM RICHARD MOORE,
a/k/a “BILLY,”**

aided abetted by each other, and others known and unknown, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTEEN

Possession with Intent to Distribute Controlled Substance (Marijuana)

21 U.S.C. § 841(a)(1)

On or about December 22, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**WILLIAM RICHARD MOORE,
a/k/a “BILLY,”
and
TAMIKA LASHAUN HUFF**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTEEN

Possession With Intent to Distribute a Controlled Substance (Cocaine)

21 U.S.C. § 841(a)(1)

On or about December 22, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

**REGINALD JAVA BROWN,
a/k/a “SPOT,”
a/k/a “RED,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTEEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about December 22, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

REGINALD JAVA BROWN,
a/k/a “SPOT,”
a/k/a “RED,”

did knowingly possess a firearm, to wit, a Smith and Wesson, .357 revolver, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 17 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT NINETEEN

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about December 22, 2020, in Chatham County, within the Southern District of Georgia, the defendant,

REGINALD JAVA BROWN,

a/k/a “SPOT,”

a/k/a “RED,”

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Smith and Wesson, .357 revolver, which had previously been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about February 4, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

HAROLD JENKINS JR,
a/k/a “POUND,”

did knowingly possess a firearm, to wit, a Master Piece Arms, 9mm handgun, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT TWENTY-ONE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about February 4, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

HAROLD JENKINS JR,
a/k/a “POUND,”

did knowingly possess a firearm, to wit, a SCCY CPX-2, 9mm handgun, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT TWENTY-TWO

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about February 4, 2021, in Chatham County, within the Southern District of Georgia, the defendant,

**HAROLD JENKINS JR,
a/k/a “POUND,”**

did knowingly possess a firearm, to wit, a North American Arms, 22 Magnum handgun, in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances* in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

FORFEITURE ALLEGATIONS

The allegations contained in Count One through Count Twenty-Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 21, United States Code, Section 853, upon conviction for any offense in violation of Title 21, United States Code set forth in this Indictment, Defendants:

**VICTOR HUGO GALLEGOS,
ROBERT CANSECO,
ADAM MATHIAS GARCIA,
a/k/a "FLAKO,"
WILLIAM RICHARD MOORE,
a/k/a "BILLY,"
AUBREY RODRIQUEZ WILLIAMS,
a/k/a "GAB,"
RAPHAEL SAMUEL SMITH,
a/k/a "RAY RAY,"
JAPHETH CHARLES ORR,
a/k/a "FATZ,"
ERIC LAVAR BROWN,
a/k/a "BOSS,"
HAROLD JENKINS JR.,
a/k/a "POUND,"
SUZANA SALINAS-GARZA,
a/k/a "SUZY,"
CHRISTOPHER JOSEPH SHOEMAKE,
a/k/a "SHOE,"
EBONY ANTONIA PERRY,
a/k/a "EB,"
REGINALD JAVA BROWN,
a/k/a "SPOT,"
a/k/a "RED,"
NOLAN SENTAL SMITH,
a/k/a "HOT,"**

**a/k/a “DREDD,”
VERNEST CLEVELAND,
a/k/a “PEANUT,”
a/k/a “VITO,”
ANTONIO TEREZ GRAHAM,
a/k/a “WEEZY,”
and
TAMIKA LASHAUN HUFF,**

shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part to commit, or to facilitate the commission of, the offense(s).

Upon conviction of any offense alleged in this Indictment, the above named defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Sections 2461(c) any firearm and ammunition involved in that offense, including but not limited to:

- a. Master Piece Arms (MPA) Tech 9, 9mm handgun, S/N F23277;
- b. SCCY 9mm handgun, S/N 226574;
- c. Taurus .22 cal. handgun, S/N AMJ16077;
- d. SH .22 cal. revolver, S/N 733604;
- e. Derringer (style) .22 caliber revolver, S/N E127142;
- f. 1911 .45 caliber handgun, S/N ML103463;
- g. Stevens model 311, Savage Arms, S/N None;
- h. Marlin .22 rifle, S/N 96641001;
- i. Marlin 30/30 rifle, S/N D3075790;

- j. Wheatherbee 270 Winchester, S/N H262334;
- k. Ruger .223 mini 14, S/N 182-60961;
- l. US Carbine .30 caliber, S/N AA28487;
- m. Harrington and Richardson 12 gauge, S/N AA28487;
- n. Winchester MD12, 12 gauge, S/N None;


If any of the property described above, as a result of any act or commission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

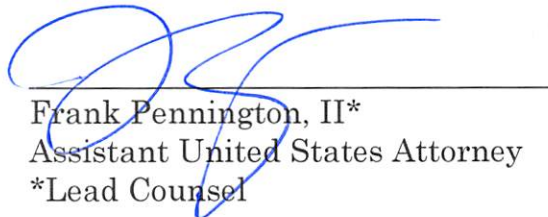
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Signatures on the following page

A True Bill.



David H. Estes
Acting United States Attorney



Frank Pennington, II*
Assistant United States Attorney
*Lead Counsel



Karl Knoche
Assistant United States Attorney
Chief, Criminal Division